

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA,

v.

GILBERTO RAMOS,
Defendant.

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Case No.: 12-224(GBL)

Hearing Date: August 9, 2013

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Comes now the Defendant, GILBERTO RAMOS, by and through counsel and moves this Honorable Court to enter an Order to continue the August 9, 2013 hearing to September 13, 2013:

1. The defendant is detained pending sentencing on his conviction for conspiracy to possess and distribute 5 kilograms or more of cocaine.
2. The presentence investigative report has been completed. The advisory guideline range is Life without the possibility of parole.
3. As detailed in the attached request for adjournment submitted by lead counsel Alan D. Bowman, the current sentencing hearing date is in conflict with an Islamic religious holiday. Attorney Bowman is a Muslim.
4. The government does not oppose the granting of this request.
5. An order granting the instant request would not prejudice the government.
6. An order granting the instant request would be in the interest of justice.

Wherefore, the Defendant, GILBERTO RAMOS, by and through counsel and moves this Honorable Court to enter an Order continuing the August 9, 2013 hearing to September 13, 2013.

I ASK FOR THIS:

GILBERTO RAMOS

By counsel

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing motion was served on all counsel of record via ECF on July 30, 2013.

_____/s/_____
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